

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MUCHMORE'S CAFE, LLC,

Civil Action No. 14-cv-5668 RRM-RER

Plaintiff,

-against-

**DECLARATION OF
ANDREW MUCHMORE**

CITY OF NEW YORK,

Defendant.

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ANDREW MUCHMORE, an attorney duly admitted to practice law before the U.S. District Court for the Southern District of New York, affirms the following under penalty of perjury:

1. I am counsel for plaintiff Muchmore's Cafe, LLC. I have personal knowledge of the facts set forth herein based upon my review of this Court's electronic docket and the documents published on the official website of the City of New York.
2. Annexed hereto as Exhibit "A" is a true and correct copy of the Amended Complaint of plaintiff Muchmore's Cafe, LLC.
3. Annexed hereto as Exhibit "B" is a true and correct copy of the Answer to Amended Complaint of defendant City of New York ("the City").
4. Annexed hereto as Exhibit "C" is a true and correct copy of the New York City Cabaret Law, N.Y.C. Admin. Code, Title 20, Chapter 2, Subchapter 20, 20-359, *et seq.*, as published on the City's website at: http://www.nyc.gov/html/dca/downloads/pdf/cabarets_catering_law_rules.pdf.
5. Annexed hereto as Exhibit "D" is a true and correct copy of the New York City Noise Code, N.Y.C. Admin. Code, Title 24, Chapter 2, Sec. 24-202, *et seq.*, as published on City's website at: <http://www.nyc.gov/html/dep/pdf/law05113.pdf>.
6. Annexed hereto as Exhibit "E" is a true and correct copy of the City's *Guide to the New York Place of Assembly Process*, which provides an outline of the requirements and process for obtaining a Place of Assembly Certificate of Operation. as published on the City's website at:

http://www.nyc.gov/html/dob/downloads/pdf/pa_guide.pdf. Upon information and belief, the full text of the law is codified at N.Y.C. Admin. Code, Title 28, Chapter 1, Article 117, Sec. 28-117.1, *et seq.*,

Dated: Brooklyn, New York
March 27, 2015

LAW OFFICE OF ANDREW MUCHMORE
Counsel for Plaintiff

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